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Hearing Date and Time: June 9, 2009 at 10:00 a.m.
Objection Deadline: June 5, 2009

Attorneys for Irving H. Picard, Esq.,
Trustee for the SIPA Liquidation of
Bernard L. Madoff Investment Securities
LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (BRL)

SIPA Liquidation

**NOTICE OF MOTION FOR ENTRY OF ORDER PURSUANT TO
SECTIONS 1526, 1527 AND 105(a) OF THE BANKRUPTCY CODE APPROVING
PROTOCOLS BY AND BETWEEN THE TRUSTEE AND THE JOINT PROVISIONAL
LIQUIDATORS OF MADOFF SECURITIES INTERNATIONAL LIMITED**

Irving H. Picard, Esq. (the "Trustee"), as trustee for the liquidation of the business
of Bernard L. Madoff Investment Securities LLC (the "Debtor" or "BLMIS"), by and through his
undersigned counsel, will move before the Honorable Burton R. Lifland, United States

Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004-1408, on June 9, 2009 at 10:00 a.m., or as soon thereafter as counsel may be heard, seeking entry of an order, pursuant to sections 1526, 1527 and 105(a) of the United States Bankruptcy Code, 11 U.S.C. §§ 101 et seq., approving certain protocols annexed to the motion (the "Motion") by and between the Trustee and the Joint Provisional Liquidators of Madoff Securities International Limited, as more particularly set forth in the Motion.

PLEASE TAKE FURTHER NOTICE that written objections to the Motion must be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by no later than **5:00 p.m. on June 5, 2009** (with a courtesy copy delivered to the Chambers of the Honorable Burton R. Lifland) and must be served upon (a) Baker & Hostetler, LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: Marc Hirschfield, (b) the Securities Investor Protection Corporation, 805 Fifteenth Street, N.W., Suite 800, Washington, D.C. 20005, Attn: Kevin Bell, and (c) Baach Robinson & Lewis, counsel to the Joint Provisional Liquidators, 1201 F Street, N.W., Suite 500, Washington, D.C. 20004, Attn: H. Bradford Glassman. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

Dated: New York, New York
May 29, 2009

Respectfully submitted,

/s/ Marc Hirschfield

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Madoff Investment Securities LLC